



January 24, 2007

Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429-9990

Dear Mr. Feldman:

The Conference of State Bank Supervisors (CSBS) appreciates the opportunity to comment on the proposed Affordable Small-Dollar Loan Guidance recently released by the Federal Deposit Insurance Corporation (FDIC).

CSBS commends the FDIC and supports the guidance. As small-dollar credit products continue to grow in popularity, it is beneficial to both the consumer and the financial institution to ensure that these products are offered in a safe and sound and cost effective manner. CSBS agrees with the FDIC that the goal of safe and sound, small-dollar credit programs is to provide customers with credit that is both reasonably priced and profitable for the institution.

CSBS encourages institutions to offer small-dollar loan products if this type of lending is consistent with the institution's expertise, market, and business plan. If an institution deems small-dollar loan products to be a valuable addition to their portfolio and meets the legitimate credit needs of the markets it serves, the FDIC Affordable Small-Dollar Loan Guidance provides valuable insight to provide these loans in a responsible and profitable manner.

Thank you for your consideration and leadership on this issue.

Best Regards,

Neil Milner
President and CEO

CONFERENCE OF STATE BANK SUPERVISORS